

III. REMARKS

Claims 1-6, 8-12, 14-19 and 21-23 are pending in this action. By this Amendment, claims 1, 4, 8, 10, 14 and 17 have been amended, claims 7, 13, and 20 have been canceled, and claims 21-23 have been added. The amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the objections and rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the above amendments and following remarks is respectfully.

New claims 21-23 includes the features of the original claims 7, 13 and 20 cancelled by the previous Amendment of 12/11/06.

In the Office Action, claims 1-6, 8-12 and 14-19 are rejected under 35 U.S.C. 102(b) as allegedly being anticipated by Choukalos et al. (US 6,425,109), hereinafter “Choukalos.” Applicants respectfully traverse this rejection for the reasons that follow.

With respect to independent claims 1, 8 and 14, Choukalos does not disclose, *inter alia*, “wherein the pin attributes include a class and a channel of the pin, and the core/pin rule generating includes bundling pins based on the class attributes and the channel attributes thereof, respectively, the bundling based on the class attributes being orthogonal to the bundling based on the channel attributes.” Choukalos does not mention bundling pins based on the respective channels.

In the Office Action, the Office asserts (with respect to the original claim 4, for example) that “G2 is a channel identifier for the pin group G2[.]” (Office Action at page 5, citing FIG. 3 of

Choukalos). Applicants respectfully disagree because Choukalos does not disclose that pin groups G1, G2 or G3 are bundled based on channels of the pins. Choukalos does not mention a channel of a pin.

In addition, Choukalos does not disclose “the bundling based on the class attributes [is] orthogonal to the bundling based on the channel attributes[.]” (Claim 1). In Choukalos, “[s]ince the ROM_ADDR_2 pin of the controller chiplet 40 is part of group G2, the HLCC then connects all the group G2 pins of the controller chiplet 40 to the same memory chiplet 44[.]” (Col. 4, lines 38-42). As such, if the Office assumes the LINK_NAME (e.g., ROM_ADDR_2) to disclose the claimed class attribute (*see*, e.g., Office Action at page 4), group G2 cannot be taken as a bundling based on the channel attribute because ROM_ADDR_2 links all the group G2 pins to memory chiplet 44. That is, bundling of G2 is not orthogonal to the bundling based on the class attribute ROM_ADDR_2 (that bundles ROM_ADDR_2 to ADDR of ROM2K_HP 44). In view of the foregoing, Choukalos does not anticipate the claimed invention. Accordingly, Applicants respectfully request withdrawal of the rejection.

The dependent claims are believed allowable for the same reasons, as well as for their own additional features. For example, with respect to claims 5, 11 and 18, Choukalos does not disclose, *inter alia*, “assigning a vector index to each pin within a multiple pin core having more than one pin with the same class and channel identifier[.]” In the Office Action, the Office asserts that “the indices 0, 1 and 2 of #40 in FIG. 3” of Choukalos disclose the claimed vector index. (Office Action at page 5). Applicants respectfully disagree because indices 0, 1 and 2 in FIG. 3 of Choukalos only indicate the group numbers G1, G2 and G3. (*See* FIG. 3 of Choukalos.) As such, Choukalos does not disclose a vector index other than the group number,

which the Office uses to disclose the channel identifier. In view of the foregoing, Choukalos does not anticipate the claimed invention.

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

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